

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**INTERNATIONAL BUSINESS
MACHINES CORPORATION,**

Plaintiff and
Counterclaim-Defendant,

v.

No. 06-cv-13565 (CLB)(MDF)

**PLATFORM SOLUTIONS,
INCORPORATED,**

Defendant and
Counterclaim-Plaintiff.

CONSENT TO STIPULATED PROTECTIVE ORDER

T3 Technologies Inc. ("T3") respectfully submits this consent to the Stipulated Protective Order entered for this matter and signed by the Honorable Stephen C. Robinson on June 14, 2007. T3 has filed a motion to intervene in the present action and is currently awaiting a ruling from the Court. Plaintiff International Business Machines Corporation ("IBM") does not oppose T3's motion to intervene. Defendant Platform Solutions, Incorporated ("PSI") agrees that T3 has substantial antitrust claims that share many common questions of fact and law with PSI's counterclaims, but has proposed consolidation of two separate actions and coordination of pretrial discovery. Currently there are depositions scheduled in the present action that may be relevant to T3's claims, regardless of whether T3 is allowed to intervene or is required to proceed in a separate action. T3 desires to participate in the depositions and discovery in this matter and, to that end, T3 agrees to be subject to and to abide by the terms of the Stipulated Protective Order. Counsel for all parties have reviewed this pleading prior to its filing. T3 has signed the Confidentiality Undertaking attached as Exhibit A.

Dated: January 7, 2008

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Noah Silverman", written in black ink.

Bruce E. Gerstein (BG-2726)

Noah Silverman (NS-5728)

Elena K. Chan (EC-2337)

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EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Plaintiff,

Case No. 06 CV 13565 (SCR)

-vs.-

PLATFORM SOLUTIONS, INC.,

Defendant.

-----x

CONFIDENTIALITY UNDERTAKING

I, Steven J. Friedman declare under penalty of perjury that I have read the Protective Order concerning the confidentiality of information in the above captioned litigation. I understand that the Protective Order is a Court Order designed to preserve the confidentiality of certain confidential information. I also understand that the Protective Order restricts the use, disclosure and retention of such confidential information and also requires the safeguarding and return of documents and other materials containing confidential information.

I agree to comply with all provisions of the Protective Order described above with respect to any information designated Confidential that is furnished to me. I hereby consent to the personal jurisdiction of the United States District Court for the Southern District of New York for any proceedings involving the enforcement of that Order.

EXECUTED this 7th day of January, 2008

Name

T3 Technologies Inc.
Affiliation

1408 Westshore Blvd.
Street
Tampa FL 33607
City, State, Zip Code

CERTIFICATE OF SERVICE

I, Elena K. Chan, hereby certify that on January 7, 2008, I electronically filed the foregoing Consent of T3 Technologies, Inc. to Stipulated Protective Order, using the CM/ECF system, which sent notification of such filing to the following:

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And to the following person via electronic mail:

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Elena K. Chan